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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

Jose Alfredo MOLINA-Guerrero and
 Christopher URIBE

Defendant(s).

No. 2:19-mj-00547-VCF

COMPLAINT

21 U.S.C. §§ 846, 841(a)(1) and
 (b)(1)(A)(viii) and (i):
 Conspiracy to Distribute a Controlled
 Substance – Methamphetamine
 and Heroin

21 U.S.C. §§ 841 (a)(1) and
 (b)(1)(A)(viii) and (i):
 Possession with Intent to Distribute
 a Controlled Substance –
 Methamphetamine and Heroin

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
 complainant, being duly sworn, deposes and states:

COUNT 1

Conspiracy to Distribute a Controlled Substance – Methamphetamine and Heroin

Beginning from a time unknown and continuing up to and including July 24, 2019, in
 the District of Nevada, defendants Jose Alfredo MOLINA-Guerrero and Christopher URIBE
 defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with
 individuals known and unknown to distribute 500 grams or more of a mixture and substance

1 containing a detectable amount of methamphetamine, a Schedule II Controlled Substance and 1
 2 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I
 3 Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
 4 (b)(1)(A)(viii) and (i).

5 COUNT 2

6 **Possession with Intent to Distribute a Controlled Substance - Methamphetamine and Heroin**

7 On or about July 24, 2019, in the District of Nevada, defendants Jose Alfredo
 8 MOLINA-Guerrero and Christopher URIBE, did knowingly and intentionally to possess with the
 9 intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of
 10 methamphetamine, a Schedule II Controlled Substance, and 1 kilogram or more of a mixture and
 11 substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation
 12 of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(viii) and (i).

13 1. On or about July 22, 2019, Drug Enforcement Administration (DEA) Special Agent
 14 (SA) Rumschlag was contacted by a confidential source (CS), referencing an individual, later
 15 identified as Jose Alfredo MOLINA-Guerrero (MOLINA-Guerrero), who utilized telephone
 16 number 442-484-7686, who was able to supply approximately twenty (20) pounds of
 17 methamphetamine, 5,000 clandestinely manufactured counterfeit Oxycodone pills, suspected to
 18 contain fentanyl, and one (1) kilogram of heroin for sale. The CS told SA Rumschlag that the
 19 narcotics were traveling from California to Las Vegas, NV, for purchase on July 24, 2019. The CS
 20 advised that the initial negotiated price of the methamphetamine was a total of \$46,000.00
 21 (\$2,300.00 per pound), the price of the pills was a total of \$60,000.00 (\$12.00 per pill) and the price
 22 for the kilogram of heroin was \$27,000.00; for a total purchase price of \$133,000.00.

23 2. On or about July 24, 2019, SA Rumschlag and Task Force Officer (TFO) Neal
 24 instructed the CS to contact MOLINA-Guerrero, via telephone number 442-484-7686, and arrange

1 for the CS to meet with MOLINA-Guerrero at Morton's Travel Center parking lot located at 1000
2 East Cheyenne Avenue, North Las Vegas, Nevada 89030, in order for law enforcement to seize the
3 narcotics.

4 3. Law enforcement established surveillance in the parking lot of the Morton's Travel
5 Center. The CS was instructed to call MOLINA-Guerrero and direct him (MOLINA-Guerrero) to
6 the CS' location. The CS advised SA Rumschlag and TFO Neal that MOLINA-Guerrero agreed to
7 the meet and would arrive in 20 to 25 minutes at the CS' location.

8 4. Prior to the meet, SA Rumschlag and TFO Neal searched the CS for illegal contraband,
9 with negative results. SA Rumschlag and TFO Neal equipped the CS with an audio recording
10 device to monitor the CS' activities during the meeting and seizure of the narcotics. At the meet
11 location, law enforcement was able to keep constant visual on the CS. At approximately 1:37 p.m.,
12 law enforcement observed the a white colored Ford sedan, bearing California license plate
13 #7JYZ912, registered to Christopher Ricardo Uribe at 53250 Calle La Paz, Coachella, CA 92236,
14 drive past the area where the CS was standing, near the Morton's Travel Center. At approximately
15 1:40 p.m., the CS contacted SA Rumschlag and TFO Neal and advised that the white Ford sedan
16 was the vehicle that the CS was to meet with. At that time, SA Rumschlag observed the white Ford
17 sedan parked in the semi-truck parking lot area near where the CS was standing. Furthermore, SA
18 Rumschlag observed a skinny Hispanic male, later identified to be MOLINA-Guerrero, walking
19 towards the CS. At that time, law enforcement officers attempted to re-position their locations to
20 observe the CS' activities. At approximately 1:43 p.m., Officers observed the CS, MOLINA-
21 Guerrero and another Hispanic male later identified as URIBE standing near the trunk of the
22 vehicle, with the truck compartment of the sedan open. At that time, the CS notified SA
23 Rumschalg that he/she had observed the narcotics and gave the pre-determined arrest signal.
24 Nevada Highway Patrol (NHP) Trooper Amber Sandoval then advised that the signal was given

1 and law enforcement officers converged on the white Ford sedan. MOLINA-Guerrero fled on foot
2 and was found hiding behind barrels in a nearby garage and subsequently arrested. Christopher
3 URIBE was also taken into custody without incident.

4 5. A search of the trunk of the white Ford sedan revealed a large white, pink and black
5 "Marshal's" re-usable plastic bag, with an open top, that contained approximately 20 clear plastic
6 wrapped packages, believed to further contain suspected methamphetamine; and one (1) plastic
7 wrapped package, believed to further contain a kilogram of suspected brown heroin and additional
8 amounts of packages of black heroin; all of which were visible from the open top of the large white,
9 pink and black "Marshal's" re-usable plastic bag. Subsequently, the suspected methamphetamine
10 and the suspected heroin were transported to the DEA Office for processing. A field test of the
11 suspected methamphetamine tested positive for the presence of methamphetamine, and had a total
12 weight of 9,112.9 grams of methamphetamine. A field test of the suspected kilogram of brown
13 heroin tested positive for the presence of heroin, had a total weight of 990.9 grams of heroin. A
14 third field test of the suspected black heroin tested positive for the presence of heroin, had a total
15 weight of 366.7 grams of heroin; for a total weight of 1,357.6 grams of heroin. The
16 methamphetamine and heroin were later booked into the North Las Vegas Police Department
17 (NLVPD) Drug Evidence room for safekeeping, pending submission for analysis.

18 6. On July 24, 2019, at the DEA LVDO, TFO Neal and SA Rumschlag completed a
19 debriefing of the CS. The CS stated that at the truck stop parking lot, he/she initially met with the
20 user of 442-484-7686 (MOLINA-Guerrero) and then walked to the white Ford sedan where he/she
21 met with the second Hispanic male (URIBE). The CS stated that at the trunk of the sedan, URIBE
22 opened the trunk compartment and then opened to the white, pink and black "Marshal's" re-usable
23 bag. The CS stated that MOLINA-Guerrero in the presence of URIBE then stepped up to the
24 opened white, pink, and black "Marshal's" re-usable bag and showed the CS the narcotics. The CS

1 stated that he/she asked MOLINA-Guerrero showed the CS the one (1) kilogram of heroin with the
2 clandestinely manufactured counterfeit Oxycodone pills, where appeared to be wrapped together.
3 The CS stated that after observing the narcotics he/she called SA Rumschlag and gave the
4 predetermined signal that the CS observed the narcotics.

5 7. On July 24, 2019, TFO Neal and NLVPD Officer Smith, at the DEA LVDO, advised
6 MOLINA-Guerrero his rights per Miranda in Spanish, at which time MOLINA-Guerrero agreed to
7 speak to law enforcement without the presence of an attorney in both Spanish and English.
8 MOLINA-Guerrero stated he was passed a telephone number for someone he only knew as
9 "Compadre" from a friend who was moving back to Mexico. MOLINA-Guerrero stated that he
10 agreed to delivery narcotic to Las Vegas for "Compadre." MOLINA-Guerrero stated that he was
11 sent to Buena Park, CA where he met with an unknown Hispanic male on a side street. MOLINA-
12 Guerrero stated that this unknown Hispanic male provided MOLINA-Guerrero a bag that contained
13 narcotics, stating that it was the same bag that was in the trunk of the vehicle. MOLINA-Guerrero
14 was asked if he knew what was in the bag and MOLINA-Guerrero stated, "Drugs." MOLINA-
15 Guerrero stated that after he picked up the drugs, "Compadre" provided him the telephone number
16 to the guy in Las Vegas who MOLINA-Guerrero was supposed to deliver the narcotics to.
17 MOLINA-Guerrero stated that he later made contact with the guy in Las Vegas and agreed to meet
18 at the truck stop where he was arrested at. MOLINA-Guerrero stated that at the truck stop, he and
19 URIBE went to the trunk of the sedan and showed the Las Vegas guy the drugs, which MOLINA-
20 Guerrero identified the narcotics as "crystal." MOLINA-Guerrero stated that he was to be paid
21 \$84,000.00 by the Las Vegas guy. MOLINA-Guerrero further stated that he was to be paid an
22 unknown amount of money by "Compadre" for delivering the narcotics. Furthermore, MOLINA-
23 Guerrero stated that he had to make the delivery because "Compadre" knew his family in Mexico.
24 ...

8. On July 24, 2019, TFO Neal and NLVPD Officer Smith advised URIBE ^{WDP} ~~her~~ ^{his} rights per Miranda in Spanish, at which time URIBE agreed to speak to law enforcement without the presence of an attorney in both Spanish and English. URIBE stated that MOLINA-Guerrero asked him about one (1) week prior if URIBE wanted to travel to Las Vegas, which URIBE agreed to do so because he had never been to Las Vegas. URIBE stated that he picked up MOLINA-Guerrero from his (MOLINA-Guerrero) house that morning and traveled to Las Vegas. URIBE stated that MOLINA-Guerrero asked URIBE if they could drop something off to MOLINA-Guerrero's cousin, which URIBE agreed to do so. URIBE stated that they met at the truck stop with a guy and he, MOLINA-Guerrero and the guy went to the trunk of car. URIBE stated that the vehicle was his so he opened the trunk of the vehicle and grabbed the white, pink and black bag to give to the unknown guy and observed "the plastic pouches" inside the bag. URIBE stated that he put the bag back into the trunk and stepped to the side of the vehicle. URIBE stated that he then observed the unknown guy on the phone and then the police arrived. URIBE stated that he had nothing further to add.

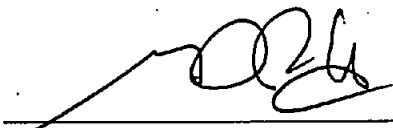
9. Based on the foregoing, your Affiant believes there is probable cause to believe that Jose Alfredo MOLINA-Guerrero and Christopher URIBE did knowingly and intentionally possess with the intent to distribute approximately 9,112.9 grams of methamphetamine, a Schedule II controlled substance, and 1,357.6 grams of heroin, a Scheduled I controlled substance, both in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(i). Furthermore, your Affiant believes there is probable cause to believe that Jose Alfredo MOLINA-Guerrero and Christopher URIBE did knowingly and intentionally conspire to possess with the intent to distribute

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...

...

1 approximately 9,112.9 grams of methamphetamine, a Schedule II controlled substance, and 1,357.6
2 grams of heroin, a Scheduled I controlled substance, both in violation of Title 21, United States
3 Code, Section 846.

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5 
6 Matthew Rumschlag, Special Agent
7 Drug Enforcement Administration

8
9 SUBSCRIBED and SWORN to before me
10 this 29th day of July, 2019.

11 
12 HONORALBE CAM FERENBACH
13 UNITED STATES MAGISTRATE JUDGE
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